

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

TRISTAR INVESTORS, INC.,

Plaintiff,

v.

**AMERICAN TOWER CORPORATION,
AMERICAN TOWERS LLC, AMERICAN
TOWERS INC., AMERICAN TOWER
GUARANTOR SUB, LLC, AMERICAN
TOWER HOLDING SUB, LLC,
AMERICAN TOWER ASSET SUB, LLC,
AMERICAN TOWER ASSET SUB II, LLC,
AMERICAN TOWER MANAGEMENT,
LLC, AMERICAN TOWER L.P.,
SPECTRASITE COMMUNICATIONS,
LLC, and AMERICAN TOWER, LLC**

Defendants.

**AMERICAN TOWER, LLC,
SPECTRASITE COMMUNICATIONS,
LLC, and AMERICAN TOWERS, LLC,**

Counter-Plaintiffs,

v.

TRISTAR INVESTORS, INC.,

Counter-Defendant.

CIVIL ACTION NO. 3:12-cv-499

PLAINTIFF'S INITIAL DESIGNATION OF EXPERTS

Pursuant to the Court's Amended Scheduling Order (Docket No. 196), the Joint Notice of Agreement to Modify Amended Scheduling Order filed July 11, 2013 (Docket No. 211), the Second Joint Notice of Agreement to Change Scheduling Order Deadlines (Docket No. 216) and

Federal Rule of Civil Procedure 26(a)(2), Plaintiff TriStar Investors, Inc. ("TriStar") hereby designates the following individuals as expert witnesses that will offer testimony and opinions in this case:

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TriStar reserves the right to elicit expert testimony, or lay opinion testimony, at the time of trial from any qualified person that would assist the jury in determining material issues of fact pursuant to the Federal Rules of Civil Procedure. In addition, TriStar reserves the right to name or call as a witness any person designated as an expert witness by other parties. TriStar makes

no representation regarding the qualifications, conclusions and/or opinions of such experts designated by other parties, and reserves and does not waive its right to object as necessary or to challenge the relevance, qualifications, competency, reliability, methodology, mental impressions, opinions and conclusions of any witness designated by any other party.

TriStar reserves the right to designate additional experts or rebuttal experts as permitted by the Federal Rules of Civil Procedure. Further, TriStar specifically reserves the right to respond to and rebut any expert reports produced by Defendants or to rebut any other evidence presented by Defendants.

Dated: August 20, 2013

VINSON & ELKINS L.L.P.

/s/ Tyler J. Bexley

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CERTIFICATE OF SERVICE

I hereby certify that on August 20, 2013, I electronically filed the foregoing Initial Designation of Experts with the Clerk of the Court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the Court. The electronic case filing system sent a "Notice of Electronic Filing" to the attorneys who have consented in writing to accept this notice as service of this document by electronic means.

/s/ *Tyler J. Bexley*